

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (SHL)

(Jointly Administered)

**THIRTY NINTH MONTHLY FEE STATEMENT OF FTI CONSULTING, INC. FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE AD HOC COMMITTEE
OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS FOR
THE PERIOD FROM DECEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

Name of Applicant:	FTI Consulting, Inc.
Authorized to provide Professional Services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 [ECF No. 553]
Period for which compensation and reimbursement is sought:	December 1, 2022 through December 31, 2022
Monthly Fees Incurred:	\$42,190.00

1. The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifesciences Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Monthly Expenses Incurred: \$0.00

Total Fees and Expenses Due: \$42,190.00

This is a: X monthly _____interim _____final application

PRIOR APPLICATIONS:

Docket No./Filed	Compensation Period	Requested		Approved	
		Fees	Expenses	Fees	Expenses
Docket No. 635 Filed On 12/9/2019	9/19/2019 – 10/31/2019	\$778,791.50	\$680.61	\$771,291.50	\$680.61
Docket No. 741 Filed On 1/13/2020	11/1/2019 – 11/30/2019	\$827,575.00	\$899.41	\$820,075.00	\$899.41
Docket No. 852 Filed on 2/20/2020	12/1/2019 – 12/31/2019	\$802,036.50	\$2,284.19	\$794,536.50	\$2,284.19
Docket No. 916 Filed on 3/12/2020	1/1/2020 – 1/31/2020	\$774,662.00	\$11,530.84	\$767,162.00	\$11,530.84
Docket No. 1090 Filed on 4/27/2020	2/1/2020 – 2/29/2020	\$615,089.00	\$6,141.22	\$610,714.00	\$6,141.22
Docket No. 1171 Filed on 5/19/2020	3/1/2020 – 3/31/2020	\$561,863.50	\$67.08	\$557,488.50	\$67.08
Docket No. 1251 Filed on 6/10/2020	4/1/2020 – 4/30/2020	\$428,303.00	\$1,732.28	\$423,928.00	\$1,732.28
Docket No. 1379 Filed on 7/13/2020	5/1/2020 – 5/31/2020	\$303,367.00	\$4,325.26	\$298,992.00	\$4,325.26
Docket No. 1651 Filed on 9/2/2020	6/1/2020 – 6/30/2020	\$374,753.00	\$96.90	\$372,253.00	\$ 96.90
Docket No. 1725 Filed on 9/25/2020	7/1/2020 – 7/31/2020	\$446,975.50	\$0.00	\$444,475.50	\$0.00
Docket No. 1850 Filed on 10/26/2020	8/1/2020 – 8/31/2020	\$261,092.00	\$108.25	\$258,592.00	\$108.25
Docket No. 1950 Filed on 10/26/2020	9/1/2020 – 9/30/2020	\$357,546.50	\$0.00	\$355,046.50	\$0.00
Docket No. 2031 Filed on 11/24/2020	9/19/2019 – 9/30/2020	\$44,462.00	\$0.00	\$41,462.60	\$0.00
Docket No. 2154 Filed on 12/18/2020	10/1/2020 – 10/31/2020	\$356,078.50	\$0.00	\$353,078.50	\$0.00
Docket No. 2308 Filed on 1/20/2021	11/1/2020 – 11/30/2020	\$450,827.00	\$0.00	\$447,827.00	\$0.00
Docket No. 2503 Filed on 3/17/2021	12/1/2020 – 12/31/2020	\$308,146.00	\$0.00	\$305,146.00	\$0.00
Docket No. 2504 Filed on 3/17/2021	1/1/2021 – 1/31/2021	\$493,773.50	\$0.00	\$490,773.50	\$0.00
Docket No. 2848 Filed on 5/12/2021	2/1/2021 – 2/28/2021	\$381,199.00	\$9.99	\$377,458.99	\$9.99
Docket No. 2849 Filed on 5/12/2021	3/1/2021 – 3/31/2021	\$513,645.00	\$0.00	\$509,895.00	\$0.00
Docket No. 3017 Filed on 6/11/2021	4/1/2021 – 4/30/2021	\$415,904.00	\$0.00	\$412,154.00	\$0.00
Docket No. 3225 Filed on 7/15/2021	5/1/2021 – 5/31/2021	\$363,711.00	\$40.00	\$360,001.00	\$40.00
Docket No. 3747 Filed on 9/9/2021	6/1/2021 – 6/30/2021	\$303,427.50	\$0.00	\$299,677.50	\$0.00

PRIOR APPLICATIONS (cont.):

Docket No./Filed	Compensation Period	Requested		Approved	
		Fees	Expenses	Fees	Expenses
Docket No. 3798 Filed on 9/21/2021	7/1/2021 – 7/31/2021	\$431,630.50	\$135.81	\$427,880.50	\$135.81
Docket No. 3941 Filed on 10/14/2021	8/1/2021 – 8/31/2021	\$284,159.00	\$20.94	\$280,409.00	\$20.94
Docket No. 4097 Filed on 11/11/2021	9/1/2021 – 9/30/2021	\$244,958.50	\$0.00	\$241,208.50	\$0.00
Docket No. 4225 Filed on 12/15/2021	10/1/2021 – 10/31/2021	\$368,998.50	\$40.00	\$367,498.50	\$40.00
Docket No. 4311 Filed on 1/26/2022	11/1/2021 – 11/30/2021	\$255,094.50	\$1,160.04	\$253,594.50	\$1,160.04
Docket No. 4312 Filed on 1/26/2022	12/1/2021 – 12/31/2021	\$192,786.50	\$0.00	\$191,286.50	\$0.00
Docket No. 4395 Filed on 2/25/2022	1/1/2022 – 1/31/2022	\$314,564.00	\$0.00	\$313,064.00	\$0.00
Docket No. 4654 Filed on 4/12/2022	2/1/2022 – 2/28/2022	\$181,198.50	\$8.00	\$178,888.84	\$8.00
Docket No. 4826 Filed on 5/16/2022	3/1/2022 – 3/31/2022	\$267,504.00	\$44.03	\$265,194.33	\$44.03
Docket No. 4833 Filed on 5/16/2022	4/1/2022 – 4/30/2022	\$175,704.00	\$0.00	\$173,394.33	\$0.00
Docket No. 4950 Filed on 7/12/2022	5/1/2022 – 5/31/2022	\$98,099.50	\$0.00	\$96,849.50	\$0.00
Docket No. 5005 Filed on 8/8/2022	6/1/2022 – 6/30/2022	\$53,624.00	\$0.00	\$52,374.00	\$0.00
Docket No. 5051 Filed on 8/31/2022	7/1/2022 – 7/31/2022	\$53,023.00	\$0.00	\$51,773.00	\$0.00
Docket No. 5132 Filed on 10/12/2022	8/1/2022 – 8/31/2022	\$35,470.00	\$0.00	\$34,220.00	\$0.00
Docket No. 5240 Filed on 11/15/2022	9/1/2022 – 9/30/2022	\$53,219.00	\$8.00	\$42,575.20	\$8.00
Docket No. 5341 Filed on 1/13/2023	10/1/2022 – 10/31/2022	\$30,107.50	\$0.00	\$0.00	\$0.00
Docket No. 5342 Filed on 1/13/23	11/1/2022 – 11/30/2022	\$31,105.00	\$0.00	\$0.00	\$0.00

Note: The fee examiner's agreed upon reductions of \$30,000, \$17,500, \$10,000, \$15,000, \$15,000, \$15,000, \$6,000, \$6,929, and \$5,000 were allocated evenly across fees from the first, second, third, fourth, fifth, sixth, seventh, eighth, and ninth interim period, respectively.

This statement (the “**Fee Statement**”) of FTI Consulting, Inc. (together with its wholly owned subsidiaries and independent contractors, “**FTI**”) as financial advisor to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants of Purdue Pharma L.P., *et al.* (the “**Committee**”) is submitted in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [ECF No. 529] and the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* [ECF No. 553] entered on November 21, 2019 and December 2, 2019, respectively, (the “**Orders**”). In support of this Fee Statement, FTI respectfully states as follows.

1. The fees and expenses for the period from December 1, 2022 through and including December 31, 2022 (the “**Fee Period**”) amount to:

Professional Fees	\$42,190.00
Expenses	<u>0.00</u>
TOTAL	<u>\$42,190.00</u>

2. If no timely and proper objection is made by a party-in-interest within fourteen (14) days after service of this Fee Statement, the Debtors are authorized to pay 80% of professional fees and 100% of out-of-pocket expenses. These amounts are presented below.

Professional Fees at 80%	\$33,752.00
Expenses at 100%	<u>0.00</u>
TOTAL	<u>\$33,752.00</u>

3. The professionals providing services, hourly billing rates, the aggregate hours worked by each professional, and the aggregate hourly fees for each professional during the Fee Period are set forth on the schedule annexed hereto as **Exhibit “A”**.
4. A summary of aggregate hours worked and aggregate hourly fees for each task code during the Fee Period is set forth on the schedule annexed hereto as **Exhibit “B”**.

5. Detailed time entry by task code during the Fee Period is set forth on the schedule annexed hereto as **Exhibit “C”**.
6. FTI reserves the right to request, in subsequent fee statements and applications, reimbursement of any additional expenses incurred during the Fee Period, as such expenses may not have been captured to date in FTI’s billing system.

NOTICE AND OBJECTION PROCEDURES

7. Objections to this Fee Statement, if any, must be filed with the Court and served upon the Notice Parties so as to be received no later than February 15, 2023 (the **“Objection Deadline”**), setting forth the nature of the objection and the amount of fees or expenses at issue (an **“Objection”**).
8. If no objections to this Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.
9. If an objection to this Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: New York, New York
February 1, 2023

FTI CONSULTING, INC.
Financial Advisors to the Ad Hoc Committee of
Governmental and Other Contingent Litigation
Claimants of Purdue Pharma L.P.

By: /s/ Matthew Diaz
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EXHIBIT A**PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649****SUMMARY OF HOURS BY PROFESSIONAL****FOR THE PERIOD DECEMBER 1, 2022 TO DECEMBER 31, 2022**

Professional	Position	Specialty	Billing Rate	Total Hours	Total Fees
Diaz, Matthew	Sr Managing Director	Restructuring	\$ 1,325	14.0	\$ 18,550.00
Bromberg, Brian	Sr Director	Restructuring	975	14.4	14,040.00
Kurtz, Emma	Sr Consultant	Restructuring	750	12.8	9,600.00
GRAND TOTAL				41.2	\$ 42,190.00

EXHIBIT B**PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649****SUMMARY OF HOURS BY TASK****FOR THE PERIOD DECEMBER 1, 2022 TO DECEMBER 31, 2022**

Task Code	Task Description	Total Hours	Total Fees
1	Current Operating Results & Events	3.1	\$ 3,072.50
2	Cash & Liquidity Analysis	1.5	1,987.50
7	Analysis of Domestic Business Plan	32.0	33,187.50
16	Analysis, Negotiate and Form of POR & DS	0.4	390.00
24	Preparation of Fee Application	4.2	3,552.50
GRAND TOTAL		41.2	\$ 42,190.00

EXHIBIT C

PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649

DETAIL OF TIME ENTRIES

FOR THE PERIOD DECEMBER 1, 2022 TO DECEMBER 31, 2022

Task Category	Date	Professional	Hours	Activity
1	12/5/2022	Diaz, Matthew	1.3	Review September operating report.
1	12/5/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	12/5/2022	Kurtz, Emma	0.6	Review recently uploaded dataroom documents re: reporting to share with team.
1	12/13/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	12/19/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1 Total			3.1	
2	12/5/2022	Diaz, Matthew	0.7	Review latest budget to actual cash analysis.
2	12/20/2022	Diaz, Matthew	0.8	Review Debtors' updated cash reporting.
2 Total			1.5	
7	12/1/2022	Diaz, Matthew	0.6	Prepare for call with the Debtors re: strategic alternatives.
7	12/2/2022	Bromberg, Brian	0.7	Participate in update call with the Debtors' advisors re: Avrio.
7	12/2/2022	Bromberg, Brian	0.6	Prepare summary for clients of FA update call.
7	12/5/2022	Bromberg, Brian	0.5	Draft revised update for counsel on Avrio.
7	12/5/2022	Bromberg, Brian	0.7	Coordinate PHI update meeting for AHC.
7	12/12/2022	Bromberg, Brian	1.3	Review prior PHI update documents provided by the Debtors.
7	12/12/2022	Bromberg, Brian	0.6	Evaluate PHI budget under the plan.
7	12/12/2022	Diaz, Matthew	1.0	Participate in a call with the Debtors to discuss the PHI updates.
7	12/12/2022	Diaz, Matthew	1.3	Review materials to prepare for call on the PHI status.
7	12/12/2022	Diaz, Matthew	1.6	Provide comments to team re: update presentation on PHI for the working group.
7	12/12/2022	Kurtz, Emma	1.0	Attend call with the Company and their advisors re: PHI.
7	12/12/2022	Kurtz, Emma	0.9	Prepare revisions to PHI update presentation per comments from team.
7	12/12/2022	Kurtz, Emma	2.4	Prepare draft presentation re: PHI updates.
7	12/13/2022	Bromberg, Brian	0.5	Discuss Avrio update with Debtors.
7	12/13/2022	Bromberg, Brian	0.5	Review prior business plan projections re: Avrio.
7	12/13/2022	Diaz, Matthew	0.8	Attend call with working group to discuss PHI updates from the Debtors.
7	12/13/2022	Diaz, Matthew	0.7	Review Avrio analysis to provide comments to team.
7	12/13/2022	Diaz, Matthew	0.6	Participate in call case professionals to discuss company status.
7	12/13/2022	Kurtz, Emma	0.8	Attend call with working group to discuss PHI update.
7	12/14/2022	Bromberg, Brian	2.1	Review Avrio materials provided by Debtors.
7	12/14/2022	Bromberg, Brian	0.7	Draft questions list for the Debtors re: Avrio.
7	12/14/2022	Bromberg, Brian	0.5	Continue to review Avrio materials provided by Debtors.
7	12/14/2022	Diaz, Matthew	2.3	Conduct detailed review of the updated Avrio business plan.
7	12/14/2022	Kurtz, Emma	1.7	Review Avrio model and materials to draft observations and questions.
7	12/15/2022	Bromberg, Brian	0.4	Coordinate Avrio questions with Houlihan.
7	12/15/2022	Bromberg, Brian	0.7	Participate in call re: Avrio with Debtors advisors.
7	12/15/2022	Bromberg, Brian	0.9	Prepare summary of Avrio call for team.
7	12/15/2022	Diaz, Matthew	0.9	Review questions and related open items on the new business plan.
7	12/15/2022	Diaz, Matthew	0.7	Review updated Avrio analysis.
7	12/15/2022	Kurtz, Emma	0.7	Attend call with the Debtors' advisors re: Avrio.
7	12/16/2022	Bromberg, Brian	0.8	Review Avrio materials provided by the Debtors.
7	12/27/2022	Bromberg, Brian	0.9	Discuss R&D call with Debtors and team.
7	12/29/2022	Bromberg, Brian	1.6	Review Avrio presentation from the Debtors
7 Total			32.0	
16	12/16/2022	Bromberg, Brian	0.4	Review Purdue de minimis sales.
16 Total			0.4	
24	12/7/2022	Kurtz, Emma	1.8	Prepare draft October fee application per local rules.
24	12/18/2022	Kurtz, Emma	1.7	Prepare draft November 2022 fee statement.
24	12/19/2022	Diaz, Matthew	0.7	Review draft November fee statement.
24 Total			4.2	
Grand Total			41.2	